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March 18, 2025

BY ECF

Honorable Harvey Bartle III, U.S.D.J.
United States District Court for the
Eastern District of Pennsylvania
16614 U.S. Courthouse
601 Market Street
Philadelphia, Pennsylvania 19106

**Re: *Atlas Data Privacy Corp., et al v. Searchbug, Inc. et al* (No. 1:24-cv-05658-HB) –
Joinder in Defendants’ Consolidated Motion to Dismiss Plaintiffs’ Complaint**

Dear Judge Bartle:

This firm represents the defendant Searchbug, Inc. (“Defendant”) in the above-referenced matter. We write to advise the Court that Defendant joins the Consolidated Motion to Dismiss Brief, which was filed under Dkt. No. 59 in the action captioned as *Atlas Data Privacy Corp. v. DM Group Inc.*, Case No. 24-cv-04075-HB, Dkt. No. (TBP) (the “Consolidated Motion to Dismiss”). For the reasons set forth in the Consolidated Motion to Dismiss, Defendant respectfully requests that the Court grant the motion and dismiss Plaintiffs’ Complaint in this matter with prejudice.

Respectfully submitted,

A handwritten signature in blue ink, reading "Kelly M. Purcaro". The signature is fluid and cursive, with a long horizontal stroke at the end.

KELLY PURCARO